The Honorable Ricardo S. Martinez 1 2 3 4 5 6 UNITED STATES DISTRICT COURT 7 WESTERN DISTRICT OF WASHINGTON AT SEATTLE 8 9 STATE OF WASHINGTON, NO. 2:22-cv-01835-RSM 10 Plaintiff, **DECLARATION OF JAMES SANDERS** IN SUPPORT OF PERKINS COIE'S 11 MOTION TO WITHDRAW AS v. **COUNSEL** 12 ALDERWOOD SURGICAL CENTER, LLC, a NOTE ON MOTION CALENDAR: 13 Washington limited liability company; April 17, 2024 pursuant to LCR 7(i) NORTHWEST NASAL SINUS CENTER P.S., (otherwise May 3, 2024) 14 a Washington professional service corporation; and JAVAD A. SAJAN, M.D., 15 Defendants. 16 17 18 I, James Sanders, declare and state as follows: 19 1. The information contained in this declaration is true and correct to the best of my 20 knowledge, and I am of majority age and competent to testify about the matters set forth herein. 21 2. RPC 1.16(a) applies to Perkins Coie's representation and requires withdrawal of 22 counsel. 23 3. We advised Defendants Alderwood Surgical Center, LLC, Northwest Nasal Sinus 24 Center P.S., and Javad A. Sajan, M.D., of the need to obtain successor litigation counsel and 25 understand that Defendants are in the process of working to identify such counsel. Perkins Coie LLP DECLARATION OF JAMES SANDERS ISO PERKINS 1201 Third Avenue, Suite 4900 COIE'S MOTION TO WITHDRAW AS COUNSEL -1 Seattle, WA 98101-3099 (2:22-cv-01835-RSM) Phone: 206.359.8000 Fax: 206.359.9000

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1	4. On April 17, 2024, I advised Alderwood Surgical Center, LLC and Northwest
2	Nasal Sinus Center P.S. that under the Court's Local Civil Rules each business entity must be
3	represented by counsel and that failure to obtain a replacement attorney by the effective date of
4	the withdrawal may result in an entry of default against the entities.
5	5. Between April 12, 2024 and April 17, 2024, Defendants requested the State
6	extend pending deadlines or to a temporary stay. The State agreed to temporarily extend a single
7	discovery response deadline and delay two depositions but did not agree to any extensions or a
8	stay.
9	
10	I declare under penalty of perjury and the laws of the State of Washington that the foregoing is
11	true and correct.
12	DATED this 17th day of April 2024, at Seattle, Washington.
13	By:/s/ James Sanders
14	James Sanders, WSBA #24565
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	DECLARATION OF JAMES SANDERS ISO PERKINS Perkins Coie LLP 1201 Third Avenue, Suite 4900

DECLARATION OF JAMES SANDERS ISO PERKINS COIE'S MOTION TO WITHDRAW AS COUNSEL -2 (2:22-cv-01835-RSM)

Seattle, WA 98101-3099 Phone: 206.359.8000 Fax: 206.359.9000